

Declaration of Kenneth Peters

As provided by 28 U.S.C. § 1746, I, Kenneth Peters, declare as follows:

1. My name is Kenneth Peters. I am a United States citizen over 18 years of age. The following facts are known to me personally, and if called as a witness, I could and would competently testify to them.
2. I am employed as a Regional Supervisor in the Investigations Division of the Office of the New York State Attorney General (“OAG”), in Buffalo, New York.
3. I have been employed with the OAG for 33 years.
4. In the course of my duties, I have reviewed documents that were produced to Plaintiffs in the matter of *CFPB et al. v. StratFS, LLC et al.*
5. I have reviewed an email sent by Zachary Newman, counsel to Chase bank, to OAG staff.
6. In that email, Mr. Newman indicates that the only outstanding interest payment due to Chase by Mr. Sasson, Mr. Behar, or Mr. Blumkin, as of February 13, 2025, is from Mr. Blumkin in the amount of \$5,571.19.
7. I have reviewed a financial disclosure executed by Ryan Sasson on January 23, 2024.
8. I have reviewed a financial disclosure executed by Ian Behar on June 18, 2024.
9. The financial disclosure form, at item 33, asks the declarant to list any assets not otherwise identified in the disclosure in any location outside of the United States.
10. The financial disclosures I have reviewed for Sasson and Behar do not list any foreign assets at item 33.
11. I have also reviewed supplemental disclosures provided by Sasson and Behar.

12. Sasson's supplemental disclosure provided on June 26, 2024, states that Sasson has a 50% stake in an entity called Timberline LLC.

13. Behar's supplemental disclosure provided on July 9, 2024, states that Behar has a 50% stake in an entity called Timberline LLC.

14. Sasson's supplemental disclosure provided on July 26, 2024, states that Timberline LLC is the 100% owner of an entity called T.G.I.C., LLC (T.C.I.G.).

15. I have reviewed records of transfers from T.C.I.G.'s account provided by Flagstar Bank.

16. These records reflect a transfer of \$2,000,000 from T.C.I.G.'s account to an entity named Yetti, OU ("Yetti").

17. Attached as **Exhibit A** is a printout showing the entry for Yetti on the website of the e-business register for Estonia, located at https://ariregister.rik.ee/eng/company/14815421/aki_person_invalidate_json, last accessed February 10, 2025.

18. The entry indicates that Yetti is an Estonian company engaged primarily in "sea and coastal passenger water transport."

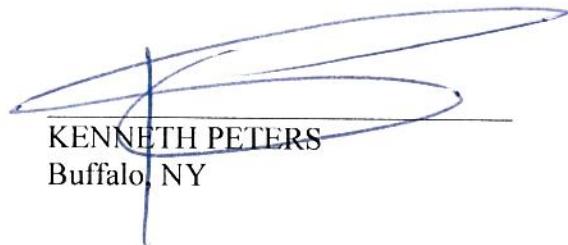
19. The July 18, 2023, transfer was made to Yetti's account at Nordea Bank AB ("Nordea").

20. Attached as **Exhibit B** is a consent order entered into between Nordea Bank, AB and the New York State Department of Financial Services.

21. The consent order states that Nordea, a global banking and financial services institution headquartered in Helsinki, Finland, helped its customers set up hundreds of offshore accounts for tax-sheltered companies.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the thirteenth day of February, 2025.



KENNETH PETERS
Buffalo, NY

A handwritten signature in blue ink, appearing to read "KENNETH PETERS", is written over a large, stylized, horizontal, oval-shaped flourish. Below the signature, the name "KENNETH PETERS" is printed in a smaller, sans-serif font, followed by "Buffalo, NY" on the next line.